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VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

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Re: ET Docket No. 94-124

Dear Mr. Caton:

On behalf of the Harris Corporation-Farion Division ("Harris"), we are filing an original and seven (7) copies of its Supplemental Comments in the above-referenced matter.

If there are any questions, please communicate with the undersigned counsel.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

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Counsel for Harris Corporation-Farion
Division

LRR:cej
Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)

(1) Amendment of Parts 2 and 15)
of the Commission's Rules to)
Permit Use of Radio Frequencies)
Above 40 GHz for New Radio)
Applications)

ET Docket No. 94-124

(2) International Harmonization of)
Frequency Bands above 40 GHz)

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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To: The Commission

**SUPPLEMENTAL COMMENTS OF THE
HARRIS CORPORATION-FARINON DIVISION**

The Harris Corporation-Farinon Division ("Harris"), by its counsel, submits the Supplemental Comments below in the above-cited matter. The opportunity to provide comments on harmonizing the FCC proposals in ET Docket No. 94-124 and the European frequency allocation table is welcomed.¹ Further, Harris notes and supports the comments being filed separately by the Fixed Point-to-Point Communications Section of the Telecommunications Industry Association (TIA)

I. GENERAL

The headquarters of the Harris Corporation is located in Melbourne, Florida. Through its Farinon Division, located in San Carlos, California, Harris designs, develops and manufactures microwave and multiplex systems used by licensees in the terrestrial fixed microwave service. Harris is one of the largest suppliers of microwave equipments in the global market. For this

¹See FCC Public Notice DA 95-1415 dated June 23, 1995 entitled "International Harmonization of Frequency Bands above 40 GHz (ET Docket No. 94-124)."

reason, Harris has consistently supported increased international harmonization of spectrum allocations on as broad a basis as practicable.

II. HARRIS IS INTERESTED

Being a major exporter of telecommunications equipments, Harris is interested in the harmonization of spectrum allocations generally and has acted accordingly. For example:

- Harris was very much involved in a TIA Petition dated September 9, 1994 encouraging the Commission to allocate the 37.0-38.6 GHz band for fixed use in accordance with current international allocations.
- Harris specifically supported the concept of spectrum harmonization in its comments on FCC RM-8643 and RM-8653 dealing with the 5 GHz bands.
- Earlier in this Docket, i.e., ET Docket 94-124, Harris and several other commenters urged harmonization of U.S. allocations above 40 GHz with existing European allocations.

III. HARMONIZATION WITH EUROPE FAVORED RATHER THAN WITH JAPAN

Harris was pleased to note the reference to discussions in FCC Public Notice DA 95-1415 between the European Radio Communications Committee of CEPT, the FCC, and NTIA. Such discussions should be continued. U.S. manufacturers of point-to-point microwave equipments have been extremely successful at marketing their systems in Europe. Harmonization of the point-to-point microwave bands above 40 GHz will continue the current successes.

Harmonization of the bands above 40 GHz will enable manufacturers to take advantage of mass production. Members of the user public on both continents will be the beneficiaries as products will be lower in cost and available sooner. Spare parts problems will become simplified.

Harris prefers harmonization with Europe over Japan for the very practical reason the markets in that country are essentially closed to foreign microwave manufacturers.

IV. HARMONIZATION OF U.S. AND EUROPEAN SPECTRUM ALLOCATIONS ABOVE 40 GHz FOR POINT-TO-POINT SERVICES ALREADY ACCOMPLISHED TO A GREAT DEGREE

U.S. point-to-point manufacturers are primarily interested in the 48.5-51.4 GHz and 55.2-58.2 GHz bands and have proposed they be allocated exclusively for point-to-point service. Both of these bands are within the international allocations for fixed service contained in the ITU Radio Regulations. The international allocations are actually for 47.2-51.4 GHz and 54.25-58.2 GHz (but are shared on a co-primary basis with other services). It is noted the European allocations vary slightly from the proposed U.S. allocation, e.g., the 50.20-50.40 GHz band is not available in Europe for point-to-point use and instead is being reserved for space research and earth exploration. The 55.2-58.2 GHz band being considered in the U.S. appears to be compatible with the ITU allocations and the European allocations.

V. NASA PROPOSAL FOR 54.25-56 GHz BAND IS A PROBLEM

In its Reply Comments to ET Docket No. 94-124, NASA has proposed that the 54.25-56.0 GHz band be made an exclusive Earth Exploration-Satellite Service band. This conflicts with the above stated proposal that the 55.2-58.2 GHz band be allocated exclusively for the point-to-point services. A check of the International Table of Frequency Allocations contained in the Radio Regulations of the ITU reveals the 51.4-54.25 GHz band is already allocated

exclusively for Earth Exploration-Satellite purposes. The CEPT Plan extends that exclusivity up to 55.2 GHz and thereby provides the opportunity for NASA to harmonize with the Europeans on the 51.4-55.2 GHz band which is a considerable amount of spectrum. The best interests of U.S. manufacturers is to harmonize with the CEPT countries to make the 55.2-58.2 GHz band an exclusive allocation for the point-to-point services.

VI. CONCLUSION

In conclusion, Harris: (1) supports the Supplemental Comments being filed by TIA, (2) urges the Commission to work with CEPT to maximize harmonization of spectrum allocations, and (3) underscores the importance to the fixed point-to-point equipment suppliers that there be U.S.-CEPT harmonization on the 48.1-51.4 GHz and 55.2-58.2 GHz bands for fixed communications purposes.

Respectfully submitted,

HARRIS CORPORATION-FARINON
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Its Attorney

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